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March 9, 1995

EPA Region 5 Records Ctr.



VIA FEDERAL EXPRESS MAIL
AND FACSIMILE (312) 353-9176

FOR SETTLEMENT PURPOSES ONLY

Mr. Steve Faryan
United States Environmental Protection Agency
77 West Jackson Boulevard
HSE-5J
Chicago, Illinois 60604-3590

Re: Intent to Comply With Administrative Order
Docket No. V-W-95-C-283

Dear Mr. Faryan:

This letter is intended to respond to U.S. EPA's Administrative Order submitted to Chicago International Exporting, Steven Cohen, Lawrence Cohen and Chicago International Chicago (hereinafter referred to collectively as "Respondents"). Respondents are still in the process of obtaining quotes for the sampling activity set out in the order. Until the quotes are obtained, Respondents cannot unconditionally commit to performing the activities set out in the order. With this cost caveat, the Respondents intend to comply with the Administrative Order (Docket No. V-W-95-C-283) consistent with our meeting in Chicago, as set forth below:

- 1) A contractor will be designated to conduct the sampling activity set out below on or about March 13, 1995.
- 2) A project coordinator will be designated on or about March 13, 1995.
- 3) Subject to receipt of bids, sampling as requested in the "Work to be Performed" section will be pursuant to our agreement at the February 27, 1995 conference as follows:
 - Two Hi Vol samples will be set up. Samples will be taken and analyzed once a week for PCBs, lead, and cadmium.

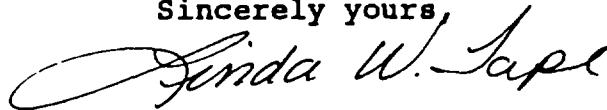
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- Samples of waste streams (metal, fines and fluff) from the shredder will be taken and analyzed once a week for PCBs, lead, and cadmium.
 - Dust residue taken out of the baghouse will be sampled for PCBs, lead, and cadmium before sent off site for disposal.
 - The sampling program will take place for eight weeks.
- 4) A work plan will be submitted after we receive the sample plan you agreed to give us and we have time for revisions. The order date requires submittal on or about March 15, 1995.
- 5) Respondents intend to comply with all other requirements in the order relating to reports, sampling analysis reporting, record retention, compliance with other laws and emergency response and notification, with the following exceptions:
- (a) EPA's request for access to the property to perform activities outside the sampling required in the order is over broad. Thus, Respondents cannot express an intent to comply.
 - (b) Respondents cannot agree to reimburse costs incurred by EPA without seeing what costs are being requested.

This letter is not an admission by Respondents of any liability. It further does not constitute agreement with any statements of law or fact in the Administrative Order.

Sincerely yours,



Linda W. Tape

LWT/cn
cc: Kurt Lindland